

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

SHANTA LYNETTE BROWN,	)	
and	)	
AQUASHA SANDIDGE,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action: 6:23cv00054
	)	
THE CITY OF LYNCHBURG, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF LYNCHBURG’S MOTION FOR SUMMARY JUDGMENT**

Defendant City of Lynchburg, by counsel, respectfully moves for summary judgment on all of the Plaintiffs’ claims against them pursuant to Rule 56 of the Federal Rules of Civil Procedure. The grounds for this motion are more fully set out in the memorandum in support filed contemporaneously with this motion.

WHEREFORE, Defendant City of Lynchburg respectfully requests that the Court enter summary judgment in its favor and dismiss the claims against it with prejudice.

CITY OF LYNCHBURG

By /s/ John R. Fitzgerald  
Jim H. Guynn, Jr. (VSB #22299)  
John R. Fitzgerald (VSB #98921)  
GUINN WADDELL, P.C.  
415 S. College Avenue  
Salem, Virginia 24153  
Phone: 540-387-2320  
Fax: 540-389-2350  
Email: [jimg@guynnwaddell.com](mailto:jimg@guynnwaddell.com)  
[johnf@guynnwaddell.com](mailto:johnf@guynnwaddell.com)  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of November, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

M. Paul Valois (VSB 72326)  
James River Legal Associates  
7601 Timberlake Road  
Lynchburg, VA 24502  
T: 434-845-4529  
F: 434-845-8536  
Email: [mvalois@vbclegal.com](mailto:mvalois@vbclegal.com)  
*Counsel for Plaintiffs*

/s/ John R. Fitzgerald  
Jim H. Guynn, Jr. (VSB # 22299)  
John R. Fitzgerald (VSB # 98921)  
GUYNW WADDELL, P.C.  
415 S. College Avenue  
Salem, Virginia 24153  
Phone: 540-387-2320  
Fax: 540-389-2350  
Email: [jimg@guynnwaddell.com](mailto:jimg@guynnwaddell.com)  
[johnf@guynnwaddell.com](mailto:johnf@guynnwaddell.com)  
*Counsel for Defendants*